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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

MARION MISIAK and MARY BETH MISIAK,)

)

)

Plaintiffs,)

)

v.)

Case No.: 07 C 6330

Judge Darrah

Magistrate Judge Nolan

MORRIS MATERIAL HANDLING, INC., a)

foreign corporation, d/b/a P&H Cranes, P&H)

CRANES, individually and as a division of Morris)

Material Handling, Inc., WHITING)

CORPORATION, a foreign corporation,)

HUBBELL INCORPORATED, a foreign)

Corporation, d/b/a Gleason Reel Corp., and)

GLEASON REEL CORP., a foreign corporation,)

a/k/a GRC International, individually and as a)

division of Hubbell Incorporated,)

)

Defendants.)

**MOTION FOR ENLARGEMENT OF TIME-RESERVING RULE 12 FRCP
OBJECTIONS**

Defendant, WHITING CORPORATION, by and through its counsel, TIMOTHY M. PALUMBO and KOPKA, PINKUS, DOLIN & EADS, P.C., without waiving any of this defendant's FRCP Rule 12 objections, moves this Court for an additional forty-five (45) days time in which to plead as this defendant has not had an adequate opportunity to investigate this matter or to investigate any possible defenses pursuant to FRCP Rule 12, and has only recently retained counsel to protect its interest.

WHEREFORE, WHITING CORPORATION, files this motion for enlargement of time and asks for an additional forty-five (45) days time in which to raise any and all objections it may have pursuant to FRCP Rule 12 or to answer, plead or otherwise respond to the plaintiffs' complaint at law in the above-styled matter.

/s/ Timothy M. Palumbo

Attorney for Defendant
KOPKA, PINKUS, DOLIN & EADS, P.C.
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CERTIFICATE OF SERVICE

I, the undersigned, certify that a true and correct copy of the foregoing was either electronically served or mailed by United States mail at 200 North LaSalle Street, Chicago, Illinois, first class postage fully prepaid, the 16th day of January, 2008, to the following:

Antonio M. Romanucci
Stephan Blandin
Romanucci & Blandin
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Chicago, IL 60602

Mark Karasik
Peter Gillespie
Baker & McKenize
One Prudential Plaza
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Subscribed and sworn to before me this 16th day of January, 2008.

/s/ Leticia Corona
Notary Public